



Seyfarth Shaw LLP

620 Eighth Avenue

New York, New York 10018

T (212) 218-5500

F (212) 218-5526

jegan@seyfarth.com

T (212) 218-5291

www.seyfarth.com

April 15, 2022

## MEMO ENDORSED

### VIA ECF

Hon. Edgardo Ramos  
U.S. District Judge  
U.S. District Court for the Southern District of New York  
40 Foley Square, Courtroom 616  
New York, NY 10007

**Re: Sanchez v. The Echo Design Group, Inc.,  
Civil Action No.: 1:22-cv-02326-ER (S.D.N.Y.)**

Dear Judge Ramos:

The defendant's request for a 30-day extension of time to respond to the Complaint to May 26, 2022 is GRANTED. It is SO ORDERED.

A handwritten signature in blue ink, appearing to read "Edgardo Ramos".

Edgardo Ramos, U.S.D.J

Dated: 4/15/2022

New York, New York

This office represents Defendant The Echo Design Group, Inc. ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Christian Sanchez ("Plaintiff"), to respectfully request a 30-day extension of the deadline for Defendant to respond to the Complaint.

By way of background, Plaintiff commenced this action on or about March 22, 2022. (ECF No. 1.) Based on the purported service date of April 5, 2022, Defendant's responsive pleading is due on April 26, 2022.

This is the first request for an extension of the responsive pleading deadline. Defendant is requesting this extension of this deadline to provide it with additional time to investigate the allegations in the Complaint, and for the parties to explore a potential non-litigated resolution of this matter. We have communicated with counsel for Plaintiff, and Plaintiff consents to this request.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this application will not impact any other scheduled deadlines. We thank the Court for its time and attention to this matter.



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Respectfully submitted,

SEYFARTH SHAW LLP

*/s/ John W. Egan*

John W. Egan

cc: All counsel of record (via ECF)